



California Regional Water Quality Control Board

Central Coast Region



Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

March 4, 2003

Mr. Richard W. McClure
Olin Corporation
Environmental Remediation Group
PO Box 248
Charleston, TN 37310-0248

Dear Mr. McClure:

SLIC: 425 TENNANT AVENUE, MORGAN HILL; REQUEST FOR SOIL AND GROUNDWATER CLEANUP ALTERNATIVES ANALYSIS

State Water Resources Control Board Resolution No. 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304*, establishes the course that responsible parties must follow in cleaning up discharges of hazardous substances. The policy applies to the perchlorate spill from the subject facility, which has degraded groundwater in the San Martin area. The policy states, in paragraph II.A.1., that the Regional Board "shall require the discharger to conduct investigation, and cleanup and abatement, in a progressive sequence" consisting of site assessments, soil and water investigations, proposal and selection of cleanup actions, implementation of cleanup actions, and monitoring. However, in situations "involving acute pollution or contamination affecting present uses of the waters of the state," the Regional Board may require the discharger to proceed with all or several of the typical progressive cleanup elements concurrently (see paragraph II.2).

The San Martin perchlorate contamination fits the description of a case where the Regional Board may require concurrent investigation and cleanup actions. Therefore, pursuant to California Water Code Section 13267, Olin shall submit, by **March 31, 2003**, an analysis of cleanup alternatives considering the following elements:

1. Source-Area Soil

Olin shall evaluate cleanup alternatives to remove the threat of ongoing discharge of perchlorate from vadose zone soils to groundwater. The evaluation shall consider the effectiveness, feasibility, and relative costs of the alternatives. The alternative you select must have substantial likelihood to achieve compliance, within a reasonable time frame, with cleanup goals applicable to the site. In this case, a reasonable time frame for cleanup of source area soils is relatively short, preferably before fall 2003.



2. Source-Area Groundwater

Expedited extraction of groundwater containing elevated concentrations of perchlorate may be an effective method of abating the threat of continuing basin-wide contamination. Olin shall evaluate the number of extraction wells and pumping rates needed to contain perchlorate currently leaving the site, whether suitable extraction wells exist or if new ones will be required, and the vertical intervals where extraction wells would be most effectively screened.

Olin shall also evaluate alternatives for reuse or disposal of extracted groundwater, including requisite treatment.

3. Basin-Wide Groundwater

Olin shall describe various alternatives for long-term, basin-wide groundwater cleanup. At this point, we are more concerned with source control, but we also want Olin to begin studying alternatives for long-term cleanup. Olin does not need to select an alternative at this time.

The alternatives analysis must also include proposed schedules for implementation of cleanup actions for both source-area soil and groundwater.

The reason the Regional Board needs the alternative analysis is to ensure appropriate and timely soil and groundwater cleanup at and in the vicinity of the subject site. The evidence that supports requiring Olin Corporation to provide the analysis includes soil and groundwater data from the site. More detailed information is available in the Regional Board's public file on this matter.

Any person affected by this action of the Regional Board may petition the State Water Resources Control Board to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be received by the State Board within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

If you have any questions, please contact **A. John Mijares at (805) 549-3696** or Harvey Packard at (805) 542-4639.

Sincerely,

Roger W. Briggs
Executive Officer

ajm/rick mcclure request for CAP soil and gw 26feb03

see next page for list of cc's



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